

Docket No.: YHK-0119



PATENT

IN THE UNITED STATES PATENT AND TRADEMARK OFFICE

In re Application of

Confirmation No.: 9669

Hyun Mok YU and Joong Seo PARK

Group Art Unit: 2629

Serial No.: 10/662,406

Examiner: Sherman, Stephen G.

Filed: 9/16/2003

Customer No.: 34610

For: METHOD AND APPARATUS FOR DRIVING PLASMA DISPLAY PANEL

PRE-APPEAL BRIEF REQUEST FOR REVIEW

U.S. Patent and Trademark Office
Customer Service Window - Mail Stop AF
Randolph Building
401 Dulany Street
Alexandria, Virginia 22314

Sir:

Applicants request review of the final rejection in the above-identified application. No amendments are being filed with this Request. This Request is being filed with a Notice of Appeal. The review is requested for the reasons stated below (not to exceed five (5) pages).

I. The Rejection under 35 USC § 102(b).

Claims 5, 6, 14, 15, 21, 22, 28, and 29 were rejected under 35 USC § 102(b) for being anticipated by the Tajima patent. It is respectfully submitted that this rejection is in error for the following reasons.

In claim 5, the Tajima patent does not disclose (1) “a gray level detector for the detecting a gray level distribution of a data” and (2) “an adjuster for adjusting at least one of the number of sustaining pulses or a subfield arrangement in accordance with a gray level distribution of said data.”

Initially, it is noted that in the Final Office Action, the Examiner did not point out where a gray-level detector is shown in any of the drawings of the Tajima patent. Instead, the Examiner indicated that such a detector was implicitly included in Tajima. More specifically, the Examiner

indicated that the function of selecting a sequence of sub-frames based on FQ and RCA1 signals necessarily requires adjustment means 75 to also perform the function of *detecting* a gray-level distribution. Applicants respectfully submitted that this is an improper reading of Tajima.

The selection of a sequence in storage means 78 is performed based on FQ and RCA1 signals. In the Final Office Action, the Examiner acknowledged that the vertical synchronization signal (V_{SYNC}) was not indicative of a gray-level distribution of data output from a detector. The same is true of the RCA1 signal.

That is, the Tajima patent expressly discloses that the RCA1 signal is merely indicative of a column address of frame data to be read. The Tajima patent does not disclose that the RCA1 signal is indicative of a gray-level distribution detected by a gray level detector, such as shown, for example, by reference numeral 7 in the non-limiting embodiment of Figure 6 of Applicants' drawings.

Contrary to the Examiner's assertion, the selection of a sub-frame sequence in storage means 78 therefore takes place without receiving gray-scale level distribution data from a gray-scale level detector. Moreover, the Tajima patent makes no disclosure, express or implied, of a gray level detector, or of adjusting a subfield arrangement based on a gray-scale level distribution detected by a detector. Absent a disclosure of these features, a *prima facie* case of anticipation for claim 5 and its dependent claims cannot be established.

Claim 6 recites that the "adjuster adjusts both the number of sustaining pulses and a sub-field arrangement in accordance with the gray level distribution of said data." (Emphasis added). The Tajima patent does not disclose these features, i.e., Tajima discloses re-arranging the sub-fields of input data based on a frame selection signal (FQ) and a column address signal RCA1. Neither signal is indicative of a gray-scale level distribution of data generated from a detector as recited in claim 5. Consequently, Tajima also fails to disclose the features of claim 6.

Claim 29 recites that "the sub-field arrangements are predetermined to reduce contour noise for different regions having a largest portion of the gray-level distribution." The Tajima patent does not disclose these features. In rejecting claim 29, the Examiner relied on the

disclosure at column 42, lines 53-60, of Tajima. But this portion of Tajima only discloses selecting a sequence of sub-frames having an alternating arrangement of high and low weights.

Neither this portion nor any other portion of Tajima discloses predetermined sub-field arrangements for reducing contour noise for different regions having a largest portion of a gray-level distribution. Absent a disclosure of these features, it is respectfully submitted that claim 29 is allowable, not only by virtue of its dependency from claim 5 but also based on the features separately recited therein.

Claim 14 recites features similar to those which patentable distinguish claim 5 from the Tajima patent, e.g., “detecting a gray level distribution of a data” and “adjusting at least one of the number of sustaining pulses or a sub-field arrangement in accordance with a gray level distribution of said data.” Applicants respectfully submit that these features are sufficient to render claims 14 and its dependent claims allowable over the Tajima patent. Applicants further submit that claim 15 is separately allowable over Tajima as it recites features similar to those which patentably distinguish claim 6.

II. The Rejections under 35 USC § 103(a).

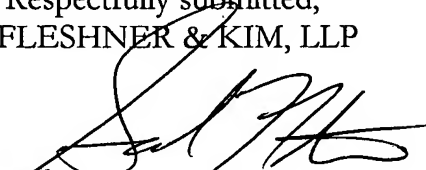
Claims 7, 8, 16, and 17 were rejected for being obvious in view of a Tajima-Tanabe combination. This rejection is in error because the Tanabe patent does not teach or suggest the features of base claims 5 and 14 missing from the Tajima patent.

Claims 19 and 20 were rejected for being obvious in view of a Tajima-AAPA combination. This rejection is in error because AAPA does not teach or suggest the features of base claim 5 missing from the Tajima patent.

Claims 23-27 and 30 were rejected for being obvious in view of Tajima taken alone. The rejection of these claims is also in error. (See the detailed arguments set forth in Amendment under 37 CFR § 1.116 filed on August 21, 2006).

Please charge any shortage in fees due in connection with the filing of this, concurrent and future replies, including extension of time fees, to Deposit Account 16-0607 and please credit any excess fees to such deposit account.

Respectfully submitted,
FLESHNER & KIM, LLP



Daniel Y.J. Kim, Esq.
Registration No. 36,186

Samuel W. Ntiros, Esq.
Registration No. 39,318

P. O. Box 221200
Chantilly, VA 20153-1200
703 766-3701 DYK/SWN:knh
Date: NOVEMBER 30, 2006

\\Fk4\Documents\2017\2017-107\110317.doc